

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RCC VENTURES, LLC

Plaintiff,

-against-

BRANDTONE HOLDINGS LIMITED

Defendant.

Civil Action No.: 1:17-cv-01585-GHW

**DECLARATION OF ROBERT
GARSON IN SUPPORT OF ENTRY OF
JUDGMENT BY DEFAULT**

I, Robert Garson, hereby declare under penalty of perjury:

1. I am a member of the Bar of this Court and am the Managing Partner of the firm of Garson, Segal, Steinmetz, Fladgate LLP, attorneys for plaintiff, RCC Ventures, LLC (“RCC” or “Plaintiff”) in the above-entitled action and I am familiar with all the facts and circumstances in this action.

2. I make this declaration pursuant to Rule 55.1 and 55.2(a) of the Civil Rules for the Southern District of New York, in support of Plaintiff’s application for the entry of a default judgment against defendant.

3. This action was commenced against Brandtone Holdings Limited (“Defendant”) by Summons and Complaint on March 2, 2017. (Dkt. 1). On March 6, 2017, Plaintiff filed its first Amended Complaint electronically. (Dkts 7-8). A copy of the Summons and Amended Complaint was served on Defendant on March 23, 2017 by personal service made on Nancy Dougherty, the authorized agent in the Office of the Secretary of State of the State of New York. (Dkt. 10.) *See* “Docket Text” section.

4. Defendant’s answer was due on April 13, 2017. (Dkt. 10). *See* “Docket Text” section.

